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12 Attorneys for Defendant  
13 Adobe Systems Inc.

14 UNITED STATES DISTRICT COURT  
15  
16 NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION  
17

18 IN RE: HIGH-TECH EMPLOYEE  
19 ANTITRUST LITIGATION

20 **Master Docket No. 11-CV-2509-LHK**

21 THIS DOCUMENT RELATES TO:  
22  
23 ALL ACTIONS  
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**DECLARATION OF LIN W. KAHN  
IN SUPPORT OF DEFENDANTS'  
JOINT ADMINISTRATIVE MOTION  
TO SEAL**

1 I, Lin Wang Kahn, declare as follows:

2 1. I am an attorney with the law firm of Jones Day, counsel for Defendant Adobe  
3 Systems Inc. ("Adobe") in the above-captioned action. I am admitted to practice law before this  
4 Court. I submit this declaration in support of Defendants' Joint Administrative Motion to Seal.  
5 As an attorney involved in the defense of this action, I have personal knowledge of the facts  
6 stated in this declaration and if called as a witness, I could and would competently testify to them.

7 **Google, Inc.'s Motion For Summary Judgment, Supporting Declaration of Anne**  
8 **Selin, and Accompanying Exhibits**

9 2. Attached hereto as Exhibit A is a true and correct copy of Google, Inc.'s Motion  
10 for Summary Judgment.

11 3. Attached hereto as Exhibit B is a true and correct copy of the presentation,  
12 attached as Exhibit 15 to the Declaration of Anne Selin ("Selin Decl."), titled "Hiring GBS,"  
13 bearing Bates number GOOG-HIGH-TECH-00433305.

14 4. Attached hereto as Exhibit C is a true and correct copy of the chart, attached as  
15 Exhibit 16 to the Selin Decl., titled "Top 25 New Hire Previous Employers," bearing Bates  
16 number GOOG-HIGH-TECH-00258494.

17 5. Attached hereto as Exhibit D is a true and correct copy of the document, attached  
18 as Exhibit 17 to the Selin Decl., titled "Google Leadership Development and Compensation  
19 Committee," dated January 30, 2008, bearing Bates number 00223682.R.

20 6. Attached hereto as Exhibit E is a true and correct copy of the presentation,  
21 attached as Exhibit 18 to the Selin Decl., titled "Sourcing Diagnostic," bearing Bates number  
22 GOOG-HIGH-TECH-00024150.

23 7. Attached hereto as Exhibit F is a true and correct copy of the document, attached  
24 as Exhibit 19 to the Selin Decl., titled "Startup Talent Competition," bearing Bates number  
25 GOOG-HIGH-TECH-00193360.R.

26 8. Attached hereto as Exhibit G is a true and correct copy of the document, attached  
27 as Exhibit 32 to the Selin Decl., titled "Gentleman's Agreements," bearing Bates number  
28 LUCAS00195586.

1           9.       Attached hereto as Exhibit V is a true and correct copy of the expert report,  
2 attached as Exhibit 33 to the Selin Decl., of Kevin M. Murphy, Ph.D., with revised exhibits, dated  
3 August 25, 2013: Exhibit 2B.

4           10.      Attached hereto as Exhibit H is a true and correct copy of the expert report,  
5 attached as Exhibit 34 to the Selin Decl., of Lauren J. Stiroh, November 25, 2013: Exhibit IV.1.

6           11.      Attached hereto as Exhibit W is a true and correct copy of the expert report,  
7 attached as Exhibit 35 to the Selin Decl., of Kevin M. Murphy, Ph.D., with revised exhibits, dated  
8 August 25, 2013: Appendix Exhibit 1A.

9           12.      Attached hereto as Exhibit X is a true and correct copy of the expert report,  
10 attached as Exhibit 36 to the Selin Decl., of Kevin M. Murphy, Ph.D., with revised exhibits, dated  
11 August 25, 2013: Appendix Exhibit 1B.

12           **Exhibits Accompanying Declaration of Victoria L. Weatherford in Support of Apple,**  
13           **Inc.'s Motion for Summary Judgment**

14           13.      Attached hereto as Exhibit I is a true and correct copy of the expert report,  
15 attached as Exhibit 8 to the Declaration of Victoria L. Weatherford ("Weatherford Decl."), of  
16 Kevin M. Murphy, Ph.D., dated August 25, 2013.

17           14.      Attached hereto as Exhibit J is a true and correct copy of excerpts to the deposition  
18 of Brian Croll, dated March 22, 2013, attached as Exhibit 15 to the Weatherford Decl.

19           **Exhibits Accompanying Declaration of Christina J. Brown in Support of**  
20           **Defendants' Joint Motion to Strike Improper Rebuttal Testimony in Dr. Leamer's**  
21           **Expert Report or, in the Alternative, for Leave to Submit a Reply Report of Dr.**  
22           **Stiroh**

23           15.      Attached hereto as Exhibit K is a true and correct copy of the Initial Class  
24 Certification Report of Edward E. Leamer, Ph.D., October 1, 2012, attached as Exhibit 3 to the  
25 Brown Decl.

26           16.      Attached hereto as Exhibit L is a true and correct copy of the Reply Expert Report  
27 of Edward E. Leamer, Ph.D., December 10, 2012, attached as Exhibit 4 to the Brown Decl.

28           17.      Attached hereto as Exhibit M is a true and correct copy of the Supplemental

1 Expert Report of Edward E. Leamer, Ph.D., May 10, 2013, attached as Exhibit 5 to the Brown  
2 Decl.

3 18. Attached hereto as Exhibit N is a true and correct copy of the Initial Merits Expert  
4 Report of Edward E. Leamer, Ph.D., October 28, 2013, attached as Exhibit 6 to the Brown Decl.

5 19. Attached hereto as Exhibit O is a true and correct copy of the Expert Report of  
6 Lauren J. Stiroh, November 25, 2013, attached as Exhibit 7 to the Brown Decl.

7 20. Attached hereto as Exhibit P is a true and correct copy of the Reply Expert Report  
8 of Edward E. Leamer, Ph.D., December 11, 2013, attached as Exhibit 8 to the Brown Decl.

9 **Exhibits Accompanying Declaration of Christina J. Brown in Support of**  
10 **Defendants' Joint Motion to Exclude the Expert Testimony of Edward E. Leamer,**  
11 **Ph.D.**

12 21. Attached hereto as Exhibit Q is a true and correct copy of the Initial Class  
13 Certification Report of Edward E. Leamer, Ph.D., October 1, 2012, attached as Exhibit 5 to the  
14 Brown Decl.

15 22. Attached hereto as Exhibit R is a true and correct copy of the Reply Expert Report  
16 of Edward E. Leamer, Ph.D., December 10, 2012, attached as Exhibit 6 to the Brown Decl.

17 23. Attached hereto as Exhibit S is a true and correct copy of the Supplemental Expert  
18 Report of Edward E. Leamer, Ph.D., May 10, 2013, attached as Exhibit 7 to the Brown Decl.

19 24. Attached hereto as Exhibit T is a true and correct copy of the Initial Merits Expert  
20 Report of Edward E. Leamer, Ph.D., October 28, 2013, attached as Exhibit 8 to the Brown Decl.

21 25. Attached hereto as Exhibit U is a true and correct copy of the Reply Expert Report  
22 of Edward E. Leamer, Ph.D., December 11, 2013, attached as Exhibit 9 to the Brown Decl.

23 26. Attached hereto as Exhibit Y is a true and correct copy of excerpts from the  
24 deposition of Edward E. Leamer, Ph.D., volume III, attached as Exhibit 3 to the Brown Decl.

25 27. Attached hereto as Exhibit Z is a true and correct copy of the expert report,  
26 attached as Exhibit 114 to Brown Decl., of Lauren J. Stiroh, dated November 25, 2013.

27 **Documents Redacted Pursuant to Local Rule 79-5(e)**

28 28. Pursuant to Local Rule 79-5(e), the following documents contain confidential

1 material designated by Plaintiffs, Intuit, Inc., Pixar, and/or Lucasfilm:

2 29. Expert Report of Lauren Stiroh (“Stiroh Report”), ¶ 71, page 28 contains  
3 information redacted as confidential by Lucasfilm.

4 30. Stiroh Report ¶¶ 77, page 29, contains information redacted as confidential by Pixar.

5 31. Stiroh Report ¶¶ 79-80 page 30, contains information redacted as confidential by  
6 Pixar.

7 32. Stiroh Report Exhibits III.41-54, contain information redacted as confidential by  
8 Lucas and Pixar.

9 33. Stiroh Report Exhibit IV.1 pp. 38-41 contains information redacted as confidential  
10 by Lucas and Pixar.

11 34. Stiroh Report Exhibit IV.3 contains information redacted as confidential by Lucas  
12 and Pixar.

13 35. Stiroh Report Exhibit IV.15 pp. 136-39 contains information redacted as  
14 confidential by Lucas and Pixar.

15 36. Stiroh Report Exhibit IV.30 contains information redacted as confidential by  
16 Lucas and Pixar.

17 37. Stiroh Report Exhibit IV.39 contains information redacted as confidential by  
18 Lucasfilm.

19 38. Stiroh Report Exhibit IV.40 contains information redacted as confidential by  
20 Pixar.

21 39. Exhibit 33 to the Declaration of Anne Selin in support of Google’s Motion for  
22 Summary Judgment, titled “Gentleman’s Agreements,” bearing bates number LUCAS00195586,  
23 contains information redacted as confidential by Lucasfilm.

24 40. Exhibit 8 to the Declaration of Victoria Weatherford in support of Apple’s Motion  
25 for Summary Judgment, footnote 10 contains information redacted as confidential by Plaintiffs.

26 41. Reply Expert Report of Edward E. Leamer, Ph.D., December 11, 2013, ¶ 6, page  
27 77 contains information redacted as confidential by Intuit.

28 42. Stiroh Report ¶¶ 59-67 pages 25-27, Exhibits III.34-40 and Exhibit IV.15, page

1 125-136, and Exhibit IV.1, pages 34-36 contain information redacted as confidential by Intuit.

2 43. Expert Report of Kevin Murphy, November 12, 2012, Appx. 1A & 1B contain  
3 information redacted as confidential by Intuit.

4  
5 I declare under penalty of perjury under the laws of the United States that the foregoing is  
6 true and correct. Executed this 9th day of January 2014 in San Francisco, California.

7  
8  
9 By: /s/ Lin W. Kahn

Lin W. Kahn